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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHENG JIANGCHEN, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

RENTECH, INC., KEITH B.
FORMAN, and JEFFREY SPAIN

Defendants.

CASE NO.: 2:17-cv-01490-GW-FFM

JOINT STIPULATION
REGARDING NOTICE OF
SETTLEMENT AND REQUEST TO
TAKE HEARING ON MOTION TO
DISMISS OFF CALENDAR

1 WHEREAS, on December 7, 2018, the Court issued an Order Regarding Briefing
2 Schedule for Motion to Dismiss (“Order”);

3 WHEREAS, within the Order, the Court stated that Defendants may file a motion
4 to dismiss on January 11, 2019, Plaintiff may file an opposition to Defendants’ motion to
5 dismiss on February 8, 2019, Defendants may file a reply in support of Defendants’
6 motion to dismiss on March 1, 2019, and that Defendants may notice the hearing on
7 Defendants’ motion to dismiss for March 21, 2019, at 8:30 a.m.;

8 WHEREAS, the parties have filed the motion, opposition, and reply as contemplated
9 by the Court’s Order;

10 WHEREAS, on February 28, 2019, the parties engaged in a private mediation session
11 and have reached an agreement to settle this action;

12 WHEREAS, the parties are in the process of preparing and drafting documents to
13 effectuate the settlement reached in this action;

14 WHEREAS, because this case is a securities class action, the parties will draft a
15 motion for preliminary approval of the settlement;

16 WHEREAS, in light of the settlement, the March 21, 2019 hearing set for Defendants’
17 motion to dismiss is no longer necessary;

18 WHEREAS, the parties anticipate that several weeks will be necessary to prepare and
19 draft documents to effectuate the settlement;

20 NOW, THEREFORE, Plaintiff and Defendants, by and through their respective
21 counsel, hereby stipulate to, and ask the Court to approve, the following:

22 1. The hearing set for Defendants’ motion to dismiss on March 21, 2019 at 8:30
23 a.m. is hereby vacated; and

24 2. The parties will file a motion for preliminary approval of the settlement on or
25 before April 30, 2019, or will apprise the Court of the status of the drafting of the motion for
26 preliminary approval of the settlement by such date.
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1 DATED: March 11, 2019 GLANCY PRONGAY & MURRAY LLP

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3 By: /s/ Ex Kano S. Sams II
4 Ex Kano S. Sams II
5 Attorneys for Lead Plaintiff
6 Ichiro Ikuno

7 DATED: March 11, 2019 HOLZER & HOLZER, LLC

8 By: /s/ Marshall P. Dees
9 Marshall P. Dees
10 Attorneys for Lead Plaintiff
11 Ichiro Ikuno

12 DATED: March 11, 2019 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

13 By: /s/ Peter B. Morrison
14 Peter B. Morrison
15 Attorneys for Defendants
16 Keith B. Forman and Jeffrey Spain
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PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On March 11, 2019, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 11, 2019, at Los Angeles, California.

s/ Ex Kano S. Sams II
Ex Kano S. Sams II